



March 30, 2021

**VIA ECF**

The Honorable Steven I. Locke  
United States Magistrate Judge  
Eastern District of New York  
100 Federal Plaza, Courtroom 840  
Central Islip, New York 11722-9014

Re: *Purvis et al. v. Golden Bell et al.*, 2:20-cv-00639-GRB-SIL  
*Parties' Amended Discovery Schedule*

Dear Magistrate Judge Locke,

The parties write jointly to provide an update on discovery and request to amend the current discovery schedule. The plaintiffs sought to depose defendant Marc Goldner on February 26, 2021, and provided notice of that deposition on January 29, 2021. Shortly before Mr. Goldner's deposition, the defendants notified the plaintiffs' counsel that Mr. Goldner was not available on that date. The parties discussed when that deposition could be rescheduled, with the defendants' counsel recently informing the plaintiffs that Mr. Goldner was not available until April 29 or 30. The plaintiffs expressed their desire to take his deposition earlier, Mr. Goldner has stated he is traveling the first two weeks of April and is unavailable until those times. The parties respectfully request that the current discovery schedule be amended to include, among other things, that Mr. Goldner is ordered to appear for his deposition on April 29. The defendants wish to depose plaintiff Justin Purvis, on a date to be determined.

The parties also still contend that documents are due from the other. The parties respectfully recommend that an amended discovery schedule place the completion of paper and electronic discovery after the completion of depositions. The parties suggest this so that the parties may seek information which comes to light during those depositions, if any, and to provide the parties with further time to complete paper and electronic discovery without the need for the Court's intervention.

To that end, the parties respectfully propose the following revised discovery schedule:

**April 29, 2021**: Marc Goldner's Deposition

**May 21, 2021**: Completion of depositions.

**July 2, 2021**: Completion of paper and electronic discovery.

**July 16, 2021**: Identification of case-in-chief experts and service of Rule 26 disclosures.



**August 13, 2021:** Identification of rebuttal experts and service of Rule 26d disclosures and completion of case-in-chief expert discovery.

**September 10, 2021:** Commencement of summary judgment motion practice and completion of rebuttal expert discovery.

The parties defer to the Court's discretion in selecting the dates for an adjourned status conference and pretrial conference.

Respectfully submitted,

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